

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

_____	)	
QUILL INK BOOKS LIMITED,	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	No. 1:19cv476-LO-MSN
	)	
RACHELLE SOTO <i>aka</i> Addison Cain,	)	
<i>Defendant.</i>	)	
_____	)	

**DEFENDANT’S MOTION FOR VOLUNTARY DISMISSAL**

PURSUANT TO RULE 41(a)(2), Defendant, Rachelle Soto a/k/a Addison Cain, moves for voluntarily dismissal her counterclaim, without prejudice.

August 13, 2020

/s/ Craig C. Reilly  
Craig C. Reilly VSB # 20942  
209 Madison Street, Suite 501  
Alexandria, Virginia 22314  
T: (703) 549-5354  
F: (703) 549-5355  
E: [craig.reilly@ccreillylaw.com](mailto:craig.reilly@ccreillylaw.com)  
*Counsel for Defendant*

SO ORDERED this \_\_\_\_\_ day of August 2020.

Alexandria, Virginia

\_\_\_\_\_  
Liam O’Grady  
United States District Judge

*Of Counsel for Defendant:*

Shawn M. Dellegar, OBA # 20973  
Crowe & Dunlevy, P.C.  
321 South Boston Avenue, Suite 500  
Tulsa, Oklahoma 74103  
T: (918) 592-9800  
E: shawn.dellegar@crowedunlevy.com  
*Counsel for Defendant (Pro Hac Vice)*

Tynia A. Watson, OBA # 30765  
Crowe & Dunlevy, P.C.  
324 N. Robinson Ave., Suite 100  
Oklahoma City, Oklahoma 73102  
T: (405) 235-7500  
E: tynia.watson@crowedunlevy.com  
*Counsel for Defendant (Pro Hac Vice)*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2020, I emailed the foregoing to office@quillinkbooks.com and electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically provide notice to all counsel of record.

/s/ Craig C. Reilly  
Craig C. Reilly (VSB # 20942)  
209 Madison Street, Suite 501  
Alexandria, Virginia 22314  
T: (703) 549-5354  
F: (703) 549-5355  
E: [craig.reilly@ccreillylaw.com](mailto:craig.reilly@ccreillylaw.com)  
*Counsel for Defendant*